

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SHEILA PORTER

Plaintiff,

v.

ANDREA CABRAL, SUFFOLK COUNTY
SHERIFF'S DEPARTMENT, and SUFFOLK
COUNTY

Defendants.

Civil Action No.04-11935-DPW

PLAINTIFF SHEILA PORTER'S PROPOSED VOIR DIRE

1. Did you or any of your family members support or oppose Sheriff Cabral in the most recent election?
2. Do you have an opinion as to whether Sheriff Cabral is doing a good job or a bad job?
3. Have you read anything about this case in the newspaper or seen anything on television?
4. Do you or any of your family members work for law enforcement, as a corrections officer, or in a corrections facility, prison, or jail now or in the past?
5. Do you have any personal feelings about someone who cooperates confidentially with law enforcement investigations?
6. Do you have any family members in a corrections facility?
7. Have you or a family member ever been charged with a crime or subject to a criminal investigation? What was the result of that charge or investigation? Did prosecution of that charge or that investigation involve a cooperating witness?
8. Do you believe that a certain amount of abuse is inevitable in a prison environment?
9. Are you opposed to awarding plaintiffs damages for pain or emotional distress?
10. Are you opposed to awarding plaintiffs punitive damages?

Respectfully submitted,

SHEILA PORTER

By her attorneys,

/s/ Joseph F. Savage, Jr.

Joseph F. Savage Jr. (BBO # 443030)

David S. Schumacher (BBO # 647917)

GOODWIN PROCTER LLP

Exchange Place

Boston, MA 02109

(617) 570-1000

Dated: December 30, 2005